



THE IMG CENTER
1360 EAST 9TH STREET, SUITE 650
CLEVELAND, OHIO 44114
TELEPHONE 216.928.7700
WWW.FANLEGAL.COM

Eric C. Nemecek, Esq.
ecn@fanlegal.com

Mara M. Hirz, Esq.
mmh@fanlegal.com

January 13, 2021

SENT VIA E-MAIL TO: daniel.riedl@usdoj.gov

AUSA Dan Riedl
United States Attorney's Office
801 West Superior Avenue, #400
Cleveland, Ohio 44113

Re: United States v. Lu, 1:21-CR-226

Dear AUSA Riedl,

I hope this correspondence finds you well. As you know, we have retained an expert witness to assist with the defense of this case. After reviewing the discovery materials provided to date, including the additional materials provided in response to our August 8, 2021 request, the expert has identified the following additional records and/or items that are needed in order to render an opinion:

- 1.) Mr. Lu's employment file, including any recent performance reviews.
- 2.) Mr. Lu's worklog for the last year of his employment.
- 3.) All Remedy tickets in EG_AS_PLM queue from August 20th, 2019 to August 29th, 2019, including create date, requester full name, queue, issue description, assignee, and resolution.
- 4.) The following files from the source safe repository ("SVN") for August 3, 2019:
 - a.) PLMLoginServlet.class; and
 - b.) IPFilter.class

5.) SVN report detailing the update and last check-in dates from July 1, 2019, through August 31, 2019, for the following files:

InventorVault.java	Security.java	ServletDirector.java
ERPIntegCommon.java	ShopFloor.java	Servlets.java
AD.java	SimpleSearchBOM.java	TNRChange.java
Background.java	TableUtil.java	IPFilter.java (*)
BackgroundMethods.java	ViewableUtil.java	security.xml
BackgroundRequest.java	WCMRequest.java	SecurityFilter.java
Command.java	WindchillRequest.java	WebService2Impl.java
CommonUtil.java	DDServlet.java	WebService2ImplCreo.java
ComponentLibrary.java	FCSCheckinServlet.java	WebService2ImplDoc.java
DragDrop.java	FileInfo.java	WebService2ImplPackageAndPrint.java
EBOMSync.java	FileInputStreamSource.java	WebService2ImplPDH.java
EnvironmentID.java	PLMLoginServlet.java (*)	WebService2ImplSearch.java
ExecCommandImpl.java	Deviation.java	WebService2ImplUtil.java
License.java	MassDownload.java	WebServiceCommon.java
MailUtil.java	PartReport.java	WebServiceFile.java
SAPIntegration.java	QuickDownload.java	WebServiceImpl.java
SAPReport.java	ResolveECODependency.java	WebServicePQNA.java
SAPUtil.java	SAPPartCompareServlet.java	

This information was previously requested on August 8, 2021. However, it was provided in a format that was incomplete/inconclusive. Extraction instructions to accurately retrieve the desired information can be provided, upon request.

6.) Electrical Enovia server restart logs from SiteScope from January 1, 2019, to December 31, 2019, including any/all email notifications sent to users.

7.) Raw data for “ChangLinjar_systems-correlation.xlsx. This information was previously requested on August 8, 2021. However, it was provided in a modified format (compiled from the original source), not as “raw data.”

Thank you in advance for your prompt attention to this matter. Please let us know if you have any questions or if you need anything else to process this request. We look forward to speaking with you soon.

Very truly yours,

/S/ Mara M. Hírz

cc: file; AUSA Brian Deckert (Brian.Deckert@usdoj.gov)